

**PAUL
HASTINGS**

August 10, 2011

The Honorable Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201-1818

Re: *Air Cargo Shipping Services Antitrust Litigation, 06-MD-1755*

Dear Magistrate Judge Pohorelsky:

Pursuant to Section I.H of your Honor's Rules of Practice, Defendant Korean Airlines Co. Ltd. ("Korean Air") respectfully requests an extension of seven days until August 19, 2011, to file its Response to Plaintiffs' Motion to Compel filed on August 5, 2011 (Doc. No. 1535), seeking to compel the production of a properly educated, knowledgeable Rule 30(b)(6) witness to testify about alleged price-fixing communications, meetings, and agreements in which Korean Air participated. Korean Air seeks this extension in order to allow it to accommodate counsels' schedules and provide a complete Response to Plaintiffs' Motion to Compel. In accordance with the Rules of Practice, Korean Air states as follows:

1. Original Date: Korean Air's original date to respond to Plaintiffs' Motion to Compel is August 12, 2011.
2. Number of Previous Requests for Extension: There have been no previous requests for an extension.
3. Adversary's Position: Korean Air has conferred with Plaintiffs' counsel and Plaintiffs' counsel has consented to the requested extension

Based upon the foregoing, Korean Air respectfully requests that the Court grant its uncontested request and enter the proposed order filed herewith.

Respectfully submitted,

/s/ Barry G. Sher

Barry G. Sher
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Counsel for Korean Air Line Co., Ltd.

CERTIFICATE OF SERVICE

I, Barry G. Sher, hereby certify that, on August 10, 2011, true and correct copies of DEFENDANT KOREAN AIRLINES CO. LTD'S CONSENT MOTION FOR AN EXTENSION OF TIME were served by electronic mail on Co-Lead Counsel for Plaintiffs, and a courtesy copy was provided by electronic mail to Counsel for Defendants.

/s/ Barry Sher

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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IN RE AIR CARGO SHIPPING)
SERVICES ANTITRUST LITIGATION)
) Master File No. 06-MD-1775 (JG) (VVP)
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MDL No. 1775)
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PROPOSED ORDER

Defendant Korean Airlines Co. Ltd.'s ("Korean Air") Consent Motion for an extension to file its Response to Plaintiffs' Motion to Compel the Production of a 30(b)(6) witness is hereby **GRANTED**.

It is hereby ORDERED that Korean Air shall file its Response to Plaintiffs' Motion on or before August 19, 2011.

SO ORDERED:

Viktor V. Pohorelsky
United States Magistrate Judge

Dated: Brooklyn, NY
August __, 2011